

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., *et al.*, *

Plaintiffs, *

v. * Civil Case No. 16-cv-3311-MJG

LAWRENCE HOGAN, *et al.*, *

Defendants. *

* * * * *

CONSENT MOTION FOR AMENDMENT OF SCHEDULING ORDER

Defendants, Governor Lawrence J. Hogan and Superintendent of Maryland State Police William M. Pallozzi, sued in their official capacity (“Defendants”), by their attorneys and with the consent of Plaintiffs, hereby move for an order amending the Scheduling Order entered in this case and state as follows:

1. On September 25, 2017, this Court entered a Scheduling Order in this case, setting a deadline of March 30, 2018 for the completion of fact discovery. (Doc. No. 36)
2. The parties have worked to complete fact discovery prior to the March 30, 2018 deadline. However, the parties needed to postpone two depositions due to a snow storm during the week of March 19, 2018 and have no available dates to conduct the depositions prior to the March 30 deadline.
3. Accordingly, counsel for the parties have agreed to extend the fact discovery deadline to April 13, 2018 for the limited purpose of completing the depositions that have been noticed by the parties to date.

4. In addition, the parties have agreed to extend other deadlines in the Scheduling Order by two weeks so that the parties will have completed fact discovery before Plaintiffs are required to make their expert disclosures.

5. There have been no previous amendments to the Scheduling Order, and no party will be prejudiced by a two-week extension of the deadlines in the order.

6. On March 21, 2018, counsel for the parties agreed to the following amendments to the Scheduling Order:

April 13, 2018	Deadline to complete previously noticed depositions.
April 16, 2018	Deadline for Plaintiffs to identify expert witnesses, provide Rule 26(a)(2) information and provide dates within 21 days on which each expert is available for deposition so that depositions can be taken.
May 15, 2018	Deadline for Defendants to identify expert witnesses, provide Rule 26(a)(2) information and provide dates within 21 days on which each expert is available for deposition so that depositions can be taken.
July 27, 2018	Deadline to file summary judgment motions.
August 14, 2018	Deadline for Plaintiff to arrange telephone conference to schedule further proceedings if no timely summary judgment motion is filed.

WHEREFORE, Defendants respectfully request that the Court enter the attached proposed order amending the Scheduling Order as set forth above.

Respectfully submitted,

BRIAN E. FROSH
Attorney General of Maryland

/s/ Robert A. Scott

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March 22, 2018

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of March, 2018, a copy of the foregoing Consent Motion was filed via ECF and thereby served on all counsel of record.

/s/ Robert A. Scott

Robert A. Scott